

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

| | | |
|---|---|-----------------------|
| |) | Chapter 11 Case No. |
| In re: |) | 22-10964 (MG)(Jointly |
| |) | Administered) |
| CELSIUS NETWORK LLC, <i>et al.</i> , ¹ |) | |
| |) | |
| Debtors. |) | |
| |) | |

**JOINDER OF JONES ASSET PROTECTION TRUST IN SUPPORT OF
MOTION SEEKING ENTRY OF AN ORDER
(I) APPROVING FURTHER DISTRIBUTION UNDER PLAN OF REORGANIZATION
FOR CORPORATE CREDITORS AND (II) GRANTING RELATED RELIEF**

TO: THE HONORABLE MARTIN GLENN
UNITED STATES BANKRUPTCY JUDGE

Frances Jones, on behalf of the Jones Asset Protection Trust hereby join the
Motion Seeking Entry of An Order (I) Approving Further Distributions Under Plan of
Reorganization For certain Corporate Creditors, and (II) Granting Related Relief [ECF No. 4911]
(the “Motion”). In support of their Joinder, which states as follows:

STATEMENT

1. On January 31, 2024, the Post-Effective Date Debtors emerged from chapter 11 and
commenced distributions under the Modified Joint Chapter 11 Plan of Reorganization
of Celsius Network LLC and Its Debtor Affiliates (Conformed for MiningCo

¹ The Post-Effective Date Debtors in these chapter 11 cases, along with the last four digits of each Post-Effective Date Debtor’s federal tax identification number, are: Celsius Network LLC (2148); Celsius KeyFi LLC (4414); Celsius Lending LLC (8417); Celsius Mining LLC (1387); Celsius Network Inc. (1219); Celsius Network Limited (8554); Celsius Networks Lending LLC (3390); Celsius US Holding LLC (7956); GK8 Ltd. (1209); GK8 UK Limited (0893); and GK8 USA LLC (9450). The location of Debtor Celsius Network LLC’s principal place of business and the Post-Effective Date Debtors’ service address in these chapter 11 cases is 50 Harrison Street, Suite 209F, Hoboken, New Jersey 07030.

Transaction), dated January 29, 2024 (Docket #4289) (hereinafter referred to as the “Plan”). The language of the Plan provides that distributions were to be made as soon as possible after January 31. However, distributions were not made timely to the Jones Asset Protection Trust as no distribution has been made at all. It is now 126 days after January 31, the date of Debtors’ emergence. The Jones Asset Protection Trust has claim no. 3.1.280169. Using a similar calculation to that used by the Faller Creditors, the Jones Asset Protection Trust has been damaged in the sum of \$125,084.19 (calculations shown in the table below). By this Joinder, the Jones Asset Protection Trust seeks compensation in the sum of \$125,084.19 from the bankruptcy estate to be made whole under the Plan.

| Claimant | Claim Value | Joinder Filed Date | BTC Price on Joinder Filed Date | ETH Price on Joinder Filed Date | Fiat Value of BTC using Joinder Filed Date Prices | Fiat Value of ETH using Joinder Filed Date Prices | Total | Total With Interest ¹ | Distribution Received | Shortfall |
|---|--------------|--------------------|---------------------------------|---------------------------------|---|---|--------------|----------------------------------|-----------------------|--------------|
| Jones Asset Protection Trust | \$132,712.83 | 6/5/2024 | \$71,694.00 | \$3,838.00 | \$67,530.50 | \$54,146.94 | \$121,677.44 | \$125,084.19 | \$0.00 | \$125,084.19 |
| 1.) Interest based on www.irs.gov/payments/quarterly-interest-rates | | | | | | | | | | |

I have written several letters to Judge Glenn about my family’s situation:

<https://cases.stretto.com/public/x191/11749/PLEADINGS/1174903042480000000093.pdf>

<https://cases.stretto.com/public/x191/11749/PLEADINGS/1174904292480000000019.pdf>

<https://cases.stretto.com/public/x191/11749/PLEADINGS/1174903192480000000071.pdf>

<https://cases.stretto.com/public/x191/11749/PLEADINGS/1174903182480000000059.pdf>

This case has created significant stress on my family for the past 2 years. We are yet to receive one cent of our claim back.

June 5th, 2024

Respectfully submitted,

Frances Jones,
Sole Director,
Jones Asset Protection Trust